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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

**PENDLETON WOOLEN MILLS, INC.**, an  
Oregon corporation,

Case No. 11-CV-592-AC

Plaintiff,

v.

Pendleton Woolen Mills, Inc.'s  
UNOPPOSED MOTION FOR EXTENSION  
OF DEADLINES / ALTERNATIVE  
REQUEST FOR RULE 16 CONFERENCE

**THE ROUND UP ASSOCIATION**, an  
Oregon corporation,

Defendant.

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**LR 7-1 CERTIFICATE OF CONFERRAL**

The undersigned Counsel for plaintiff Pendleton Woolen Mills, Inc. certifies that she has conferred with counsel for defendant The Round Up Association and that defendant does not oppose this motion.

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REQUEST FOR RULE 16 CONFERENCE

**MOTION**<sup>1</sup>

Pursuant to Fed. R. Civ. P. 6(b) and LR 16.3(a), plaintiff moves the Court for an order extending the current case deadlines 120 days.

This Motion is made in good faith and not for the purposes of delay. Defendant waived service of the Complaint and the First Amended Complaint. Based on that waiver, Defendant's deadline to file an Answer or other response to the First Amended Complaint is August 29, 2011. Counsel for the parties participated in the Fed. R. Civ. P. 26(f) initial conference of counsel for discovery planning on Friday, July 22, 2011. At that time, the parties agreed to discuss more specific discovery deadlines after the pleadings are all on file.

Plaintiff thus requests that the case deadlines be extended 120 days from the current deadlines as an interim measure to allow time for the pleadings to be filed. The parties expect to file an additional extension request and/or request for a Rule 16 conference after the pleadings are in order so that the parties will have the benefit of knowing the claims and defenses in the case when discussing discovery deadlines.

In the alternative, pursuant to Fed. R. Civ. P. 16(b) and LR 16-2, plaintiff requests that the Court set a Rule 16(b) scheduling and planning conference to address the parties' proposed extension of the current case deadlines.

DATED: August 1, 2011

LANE POWELL PC

By 

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Attorneys for Plaintiff Pendleton Woolen Mills, Inc.

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<sup>1</sup> All of the facts set forth in this Motion are supported by the declaration of Parna A. Mehrbani, filed concurrently herewith.